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*Attorneys for Defendants* CITY OF LOS ANGELES and EDEN MEDINA

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

TERESA DOMINGUEZ, et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, et al.,

Defendants.

Case No. CV17-04557 DMG (PLAx)

**NOTICE OF MOTION TO AWARD  
TAXED COSTS JOINTLY AND  
SEVERALLY AGAINST  
PLAINTIFFS' COUNSEL  
(28 U.S.C. § 1927)**

Judge: Hon. Dolly M. Gee  
Hearing Date: June 4, 2021  
Time: 9:30 a.m.

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on June 4, 2021 at 9:30 a.m., or as soon  
3 thereafter as this motion may be heard in Courtroom 8C of the above-titled Court,  
4 located at 350 W. 1st Street, Los Angeles, California, 90012, Defendants the City of  
5 Los Angeles and Eden Medina will and hereby do move for an order deeming \$889.10  
6 of the costs previously taxed against Plaintiffs to be awarded joint and severally against  
7 Plaintiffs' counsel pursuant to 28 U.S.C. § 1927.

8 The motion is based on this notice, the accompanying memorandum of points  
9 and authorities, the concurrently filed declaration of Jonathan H. Eisenman, the  
10 Application to the Clerk to Tax Costs and evidence attached thereto (Doc. No. 261), and  
11 the Clerk's April 6, 2021 Order (Doc. No. 262) granting costs—as well as oral  
12 argument offered at any hearing on this motion.

13 The motion is made following the conference of counsel pursuant to Local  
14 Rule 7-3. The conference took place via formal correspondence dated  
15 December 16, 2020 and December 31, 2020, an exchange of correspondence on January  
16 7, 2021, and further correspondence sent on April 6, 2021.

17 Respectfully submitted,

18 Dated: April 14, 2021

19 LOS ANGELES CITY ATTORNEY'S OFFICE

20 Michael N. Feuer

21 Kathleen A. Kenealy

22 Scott Marcus

23 Blithe S. Bock

Jonathan H. Eisenman

24 /s/ Jonathan H. Eisenman

25 By: Jonathan H. Eisenman, Deputy City Attorney  
26 *Attorneys for Defendants*

27 CITY OF LOS ANGELES and EDEN MEDINA